

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 4:20-CR-125 SEP (PLC)
)	
ERVIN RAY HILL,)	
)	
Defendant.)	

**DEFENDANT ERVIN RAY HILL'S MOTION FOR LEAVE TO FILE
PRETRIAL MOTION OUT OF TIME**

COMES NOW Defendant Ervin Ray Hill ("Defendant"), by and through his attorney, James W. Schottel, Jr., and for his Motion for Leave to File Pretrial Motion Out of Time, and states to this Honorable Court as follows:

1. When attempting to file the motion to suppress yesterday, the undersigned experienced the same error that he did last week.
2. Through trial and error it turns out that there was an error with my Adobe Acrobat software.
3. Once this error was corrected, all exhibits could be prepared and labeled and attached to Defendant's motion to suppress and filed.

WHEREFORE, for the foregoing reasons, Defendant Ervin Ray Hill respectfully requests this Honorable Court to grant his Motion for Leave to File Pretrial Motion Out of Time and for such other and further relief this Honorable Court deems just and proper under the circumstances.

Respectfully submitted,

SCHOTTEL & ASSOCIATES, P.C.

BY: s/James W. Schottel, Jr.

James W. Schottel, Jr. #51285MO
906 Olive St., PH
St. Louis, MO 63101
(314) 421-0350
(314) 421-4060 facsimile
jwsj@schotteljustice.com

Attorney for Defendant
Ervin Ray Hill

CERTIFICATE OF SERVICE

I hereby certify that on January 30, 2020 the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon the following:

Gregory Goodwin
gregory.goodwin@usdoj.gov

Attorney for Plaintiff
United States of America

s/James W. Schottel, Jr.